

**UNITED STATES DISTRICT COURT  
THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Court No. 7:20CV00321
	)	
v.	)	
	)	
APPROXIMATELY \$205,242.23 IN	)	
PAYPAL, INC. ACCOUNT NO.	)	
XXXXXXXXXXXXXXXXXXXX2882,	)	
APROXIMATELY \$128,868.73 IN	)	
PAYPAL, INC. ACCOUNT NO.	)	
XXXXXXXXXXXXXXXXXXXX1839,	)	
APPROXIMATELY \$194,982.40 IN	)	
PAYPAL INC. ACCOUNT NO.	)	
XXXXXXXXXXXXXXXXXXXX2700, AND	)	
APPROXIMATELY \$13,923.97 IN	)	
PAYPAL INC. ACCOUNT NO.	)	
XXXXXXXXXXXXXXXXXXXX57714,	)	
	)	
Defendants.	)	

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

Now comes the plaintiff, United States of America, by and through its attorney, Krista Consiglio Frith, Assistant United States Attorney, and brings this Complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**NATURE OF THE ACTION**

1. This is a civil action *in rem* brought to forfeit and condemn certain personal property assets to the use and benefit of the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(A) and/or (D), for violations of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1957 and 18 U.S.C. §§ 1341 and 1343.

**THE DEFENDANTS *IN REM***

2. The defendant property consists of the following property:

(a) Approximately \$205,242.23, presently located in PayPal Inc. Account No. XXXXXXXXXXXXXXXX52882;

(b) Approximately \$128,868.73, presently located in PayPal Inc. Account No. XXXXXXXXXXXXXXXX1839.

(c) Approximately \$194,982.40, presently located in PayPal Inc. Account No. XXXXXXXXXXXXXXXX2700.

(d) Approximately \$13,923.97, presently located in PayPal Inc. Account No. XXXXXXXXXXXXXXXX7714.

### JURISDICTION AND VENUE

3. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

5. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1) because acts giving rise to this forfeiture occurred in this district.

6. Upon the filing of this Complaint, the plaintiff requests that the Court issue a Warrant of Arrest and Seizure *in rem* pursuant to Supplemental Rule G(3)(b)(ii), which the plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

### BASIS FOR FORFEITURE

7. The defendant property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as the property was involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1957; and/or pursuant to 18 U.S.C. § 981(a)(1)(D), as property that represents or is traceable to the gross receipts obtained, directly or indirectly, from a violation of 18 U.S.C. §§ 1341 and/or 1343.

FACTS

8. The Defendant Property was obtained from a fraudulent scheme, wherein individuals in China purported to sell face masks and N-95 respirators to individuals in the United States, including the Western District of Virginia, at inflated prices. The purchasers sent the sellers money through PayPal, but the purchasers never received any masks.

9. Three websites were set up to sell N-95 respirators and other protective facemasks: mygoodmask.com, greatmask.com, and safetysmask.com (“Fraudulent Websites”).

10. The Fraudulent Websites were set up in February and March 2020.

11. In February and March 2020, the cases of COVID-19 in the United States began to rise and demand for N-95 respirators and other protective facemasks increased.

12. The Fraudulent Websites are registered to Fengling Xu, with an address in Jacksonville, Florida, and the telephone number 626-515-6558.

13. Fengling Xu does not live at the address in Jacksonville, Florida.

14. The address in Jacksonville, Florida, belongs to individuals who have no association with Fengling Xu or the Fraudulent Websites.

15. The telephone number associated with the Fraudulent Websites’ registration is a Voice Over Internet Protocol number with no name associated with it.

16. The Fraudulent Websites provided false contact information for the sellers.

17. The Fraudulent Websites contained a “contact us” page listing a Winchester, Virginia, address and the following telephone number: 540-450-4525.

18. The Winchester, Virginia, address belongs to individuals who have no association with Fengling Xu or the Fraudulent Websites.

19. Payments for the masks ordered on the Fraudulent Websites went through PayPal.

20. PayPal Account No. XXXXXXXXXXXXXXXX2882 (Account No. 1) was opened on February 9, 2020, by Yan Fei Wang and was associated with two phone numbers with the country code for China: +86 18559322586 and +86 17100953855.

21. The Internet Protocol (IP) address used to setup PayPal Account No. 1 resolves to China.

22. Payments for masks purchased through the Fraudulent Websites went to PayPal Account No. 1.

23. The PayPal payments to PayPal Account No. 1 appeared on buyers' credit card statements as FMONLINESHO.

24. None of the individuals who sent money to PayPal Account No. 1 received the masks they ordered from the Fraudulent Websites.

25. On April 20, 2020, PayPal closed Account No. 1 and froze the money in the account.

26. As of June 4, 2020, PayPal Account No. 1 contained \$205,242.23 in proceeds obtained from the purported sale of masks from the Fraudulent Websites.

27. PayPal Account No. XXXXXXXXXXXXXXXX1839 (Account No. 2) was opened on February 2, 2020, by Fui Chi and was associated with two phone numbers with the country code for China: +86 16525836224 and +86 17100951703.

28. The IP address used to setup PayPal Account No. 2 resolves to China.

29. Payments for masks purchased through the Fraudulent Websites went to PayPal Account No. 2.

30. The PayPal payments to PayPal Account No. 2 appeared on buyers' credit card statements as FMONLINESHO.

31. None of the individuals who sent money to PayPal Account No. 2 received the masks they ordered from the Fraudulent Websites.

32. On March 29, 2020, PayPal closed Account No. 2 and froze the money in the account.

33. As of June 4, 2020, PayPal Account No. 2 contained \$128,868.73 in proceeds obtained from the purported sale of masks from the Fraudulent Websites.

34. PayPal Account No. XXXXXXXXXXXXXXXX82700 (Account No. 3) was opened on January 1, 2020, by Meng Xuan Wang and was associated with two telephone numbers with the country code for China: +86 18659488635 and +86 13062290174.

35. The IP address used to setup PayPal Account No. 3 resolves to China.

36. Payments from masks purchased through the Fraudulent Websites went to PayPal Account No. 3.

37. The PayPal payments to PayPal Account No. 3 appeared on buyers' credit card statements as BESTONLINES.

38. None of the individuals who sent money to PayPal Account No. 3 received the masks they ordered from the Fraudulent Websites.

39. On April 22, 2020, PayPal closed Account No. 3 and froze the money in the account.

40. As of June 4, 2020, PayPal Account No. 3 contained \$194,982.40 in proceeds obtained from the purported sale of masks from the Fraudulent Websites.

41. PayPal Account No. XXXXXXXXXXXXXXXX7714 (Account No. 4) was opened on February 10, 2020, by Yin Wen Jun and was associated with two telephone numbers with the country code for China: +86 17100950088 and +86 17100956858.

42. The IP address used to setup PayPal Account No. 4 resolves to China.

43. Payments for masks purchased through the Fraudulent Websites went to PayPal Account No. 4.

44. The PayPal payments to PayPal Account No. 4 appeared on buyers' credit card statements as FMBESTONLIN.

45. None of the individuals who sent money to PayPal Account No. 4 received the masks they ordered from the Fraudulent Websites.

46. On April 21, 2020, PayPal closed Account No. 4 and froze the money in the account.

47. As of June 4, 2020, PayPal Account No. 4 contained \$13,923.97 in proceeds obtained from the purported sale of masks from the Fraudulent Websites.

48. These facts and additional facts supporting this Complaint are stated in the attached Declaration of Special Agent Theresa C. Hudson, Federal Bureau of Investigation, and are incorporated by reference herein.

WHEREFORE, the United States of America respectfully requests that the Clerk of Court issue a Warrant of Arrest *in rem* pursuant to Supplemental Rule G(3)(b); that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

THOMAS T. CULLEN  
United States Attorney

s/Krista Consiglio Frith  
Krista Consiglio Frith  
Virginia State Bar No. 89088

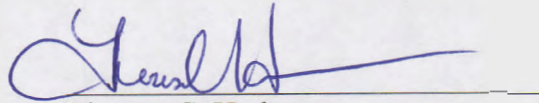
Michael A. Baudinet  
Virginia State Bar No. 83633  
Assistant United States Attorneys  
310 First Street, S.W., Room 906  
Roanoke, VA 24011  
Phone: 540-857-2250  
Fax: (540)857-2614  
[krista.frith@usdoj.gov](mailto:krista.frith@usdoj.gov)  
[michael.baudinet@usdoj.gov](mailto:michael.baudinet@usdoj.gov)

VERIFICATION

I am a Special Agent of the Federal Bureau of Investigation, and one of the agents assigned the responsibility for the above-captioned matter. I have read the contents of the foregoing Complaint for Forfeiture, and the statements contained therein are true to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9th day of June, 2020.



Theresa C. Hudson  
Special Agent, Federal Bureau of Investigation



**DECLARATION AND AFFIDAVIT OF THERESA C. HUDSON**  
**IN SUPPORT OF A COMPLAINT FOR FORFEITURE**

I, Theresa C. Hudson, having been duly sworn, provide the following information in support of the filing of a VERIFIED COMPLAINT FOR FORFEITURE *IN REM*:

1. I make this affidavit in support of a complaint for forfeiture against U.S. currency held in four (4) accounts held by PayPal, Inc. ("PayPal"). Based on information developed during my investigation as set forth herein, there is probable cause to believe that the funds in the below listed accounts, all maintained at PayPal, constitute property involved in violations of 18 U.S.C. § 1956(a)(1)(B)(i), 18 U.S.C. § 1957, and/or proceeds derived from violations of 18 U.S.C. § 1341, and 18 U.S.C. § 1343, and are therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and 18 U.S.C. § 981(a)(1)(D):

Account No.	Account Name	Associated Email	Amount
2882	FMONLINESHO	makeasnowman@outlook.com	\$ 205,242.23
1839	FMONLINESHO	inevitableoff@outlook.com	\$ 128,868.73
2700	BESTONLINES	creamgeernblue@outlook.com	\$ 194,982.40
7714	FMBESTONLIN	theGreatWallcool@outlook.com	\$ 13,923.97

**INTRODUCTION**

2. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been in that role since March 1999. I am currently assigned to the Winchester Residence Agency of the FBI Richmond Division and am the coordinator of the FBI's I-81 Human Trafficking Task Force (I81 HTTF). As part of my duties as an FBI Special Agent, I investigate crimes involving violations of various federal laws, including wire and mail fraud, money laundering, crimes against children, counterterrorism, forced labor, and sex trafficking by force, fraud, or coercion. I have received training in the use of computer technology by criminals and have participated in investigations involving the use of computers, the Internet, and social media by criminals. Through my training and experience, I have become familiar with some of the ways in which criminals use the Internet to harass and intimidate their victims. I also am a Certified Fraud Examiner through the Certified Fraud Examiner's Association.

3. The facts in this affidavit are based on my personal observations, my training and experience, professional research, and information obtained from other law enforcement agents and from witnesses. I set forth only those facts necessary to establish probable cause to believe that the property to be forfeited derives from proceeds as the result of violations of federal law and/or involved in money laundering. This affidavit does not set forth all of my knowledge about this matter.

4. This investigation began due to numerous complaints received by federal enforcement agencies, including the FBI's Internet Crime Complaint Center ("IC3") and the Federal Trade Commission. Individuals submitting these complaints ("Complainants") reported that they placed orders for N-95 respirators and other protective face masks on the internet but did not receive those masks. These Complainants either never received any item from the seller, or

instead received a cheap toy or trinket that the Complainant did not order. Complainants reported placing orders primarily from the following three internet domain names: mygoodmask.com; greatmask.com; and safetysmask.com. (collectively the “Fraudulent Websites”).

5. Due to the COVID-19 pandemic, face masks are in high-demand. In particular, due to their use by medical and healthcare professionals, there is significant demand for filtering facepiece respirators such as N-95 respirators. In light of this high demand, on March 25, 2020, the Secretary of Health and Human Services designated filtering facepiece respirators, including the N-95 face mask, as scarce or threatened materials pursuant to the Defense Production Act, 50 U.S.C. § 4512.

6. The 3M Company is one of the world’s largest manufacturers of the N95 respirators as well other face masks and other Personal Protective Equipment (PPE). According to a press release published by 3M on May 18, 2020, 3M has not changed the prices of 3M respirators due to the COVID-19 outbreak. The press release also stated the list prices for the respirators. The list price ranged from \$0.68 - \$3.40, depending on the respirator model<sup>1</sup>. According to an article in USA Today, the average high price of surgical masks after the World Health Organization declared a global health emergency on January 30, 2020, was 166% higher than the 90-day average price<sup>2</sup>.

7. An investigation into the complaints about the Fraudulent Websites revealed a scheme in which individuals set up fraudulent websites to purportedly sell face masks, including N-95 respirators, at excessively high prices. The Fraudulent Websites would accept payment for the face masks through PayPal. The operators of the Fraudulent Websites, however, would not fulfill the orders. Instead, after operating for a period of approximately one to two weeks, the Fraudulent Websites would be shut down after fraudulently obtaining thousands of dollars from victims.

### **THE FRAUDULENT WEBSITES**

8. My investigation revealed that the owners of the Fraudulent Websites used false information to establish the domain name. Obtaining a domain name involves registering the desired domain name with an organization called ICANN through a domain name registrar. The registration fee is approximately \$10-\$35. GoDaddy, Inc (“GoDaddy”) is an Internet domain registrar. When purchasing a domain name from GoDaddy, purchasers must provide contact information including a name, physical address, telephone number, and email address. Information provided to GoDaddy by purchasers can be publicly accessed through WHOIS records.

9. A search of WHOIS identified the registrant of the Fraudulent Websites as Fengling

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<sup>1</sup> 3M. (2020, May 18) Fraudulent Activity, Price Gouging, and Counterfeit Products [Press release]. Retrieved from <https://multimedia.3m.com/mws/media/18036700/fraudulent-activity-price-gouging-and-counterfeit-products.pdf>

<sup>2</sup> Tyko, K. (2020, March 11). Coronavirus price gouging: Face masks prices increased 166% on Amazon, report finds. USA Today. Retrieved from [www.usatoday.com/story/money/2020/03/11/amazon-price-gouging-report-coronavirus-face-masks/5007990002/](http://www.usatoday.com/story/money/2020/03/11/amazon-price-gouging-report-coronavirus-face-masks/5007990002/)

Xu, [REDACTED], Jacksonville, Florida 32220, telephone number 626-515-6558, and email address xufenglingbestcoolstyle@outlook.com. WHOIS also identified the date of registration for each of the Fraudulent Websites:

- Domain name safetysmask.com was registered on February 23, 2020;
- Domain name mygoodmask.com was registered on February 27, 2020;
- Domain name greatmasks.com was registered on March 5, 2020.

10. My investigation did not find any connection between Fengling Xu and the telephone 626-515-6558 or address [REDACTED], Jacksonville, Florida 32220. According to Accurint, a comprehensive public records database available to law enforcement, telephone number 626-515-6558 is a Voice Over Internet Protocol (VoIP) number with no name associated with it. When Fengling Xu's name was searched in Accurint, there were no names found associated with a Florida address. A search in Accurint determined that this property was purchased on or about January 14, 1983 by E.C. and C.C. to be used as a mobile/manufactured home. The property currently contains a mobile manufactured home that was built in or around 1991. According to Accurint, the current residents are E.C. and C.C.

11. The Fraudulent Websites also provided false contact information for customers on the websites themselves. Your Affiant personally reviewed the website "safetysmask.com" on or about April 2, 2020. The website contained the following information on the "contact us" page: "Email: Antidusmask@outlook.com, Please Call at: (540)450-4525, Address (sic): [REDACTED], Winchester, Virginia, 22602, USA." Winchester, Virginia is located in the Western District of Virginia.

12. According to Complainants, the websites mygoodmask.com and greatmasks.com provided this same contact information. My investigation also determined that seven additional websites used this same contact information, as well as similar website templates and photographs. These additional websites include: maskcheap-online.com, masksupport.com, happymasker.com, flumaskstore.com, leggingtight.com, maskhealthy.com and avacare.online.

13. An Accurint search determined that [REDACTED], Winchester, Virginia is owned by E.L. and was purchased in 2011. My investigation determined that residents of this property are E.L., his wife G.L. and adult daughter J.L.

14. On March 19, 2020, J.L., contacted the Frederick County Sheriff's Office because she had received a call from a woman who complained she had not received the face masks she ordered. When J.L. denied any knowledge of this, the woman advised her that J.L.'s phone number and address were listed on a website. The woman sent J.L. a screenshot of the website safetysmask.com, which did indeed list J.L.'s address, however, the telephone number was one digit different from J.L.'s cell phone number.

15. Law enforcement interviewed J.L. on April 3, 2020 at her residence [REDACTED]. She advised that on or about March 19, 2020, E.L. received a telephone from an irate



woman. As her father spoke limited English, J.L. returned the woman's call. The caller claimed she had ordered face masks online that we not delivered. The caller stated that the seller listed [REDACTED], Winchester, Virginia as the seller's address. J.L. told the woman she did not know anything about facemasks and she and her family were not selling anything. On May 21, 2020, J.L. also provided law enforcement with copies of complaints she has received via U.S. Mail from individuals who did not received face masks.

### PAYPAL ACCOUNTS

16. Many of the Complainants reported that they used PayPal to pay for their face mask purchases. After Complainants placed their face mask orders, they usually received an email confirmation that included the online seller's merchant name and email address. The merchant names "FM Online Shop" and "Best Onlines" were associated with the transactions identified by Complainants. Based upon a review of PayPal records, numerous email addresses were associated with FM Online Shop and Best Onlines including: makeasnowman@outlook.com; inevitableoff@outlook.com; support@perfectidea.me; antidustmask@outlook.com; creamgeernblue@outlook.com, thegreatwallcool@outlook.com, and xufenglingbestcoolstyle@outlook.com.

17. According to PayPal's Law Enforcement Records Guide, "PayPal is an account-based service that allows customers to send and receive money using their credit card, bank account, or PayPal balance. Account holders use PayPal to electronically send money to other internet merchants or friends and relatives. In order to initiate a payment, the customer must log into their account from a computer, phone or table (sic), enter the email address or phone number of the recipient, the amount they want sent, and the funding option. After the payment is completed, PayPal immediately sends an email notification to both the sender and recipient of the payment. The recipient can keep the funds in their PayPal account, send the funds to another PayPal account, or transfer the funds to a bank account."

18. The following is information from PayPal records associated with the four email addresses:

- Account No. 1: makeasnowman@outlook.com , associated with PayPal account # [REDACTED] 2882;
- Account No. 2: inevitableoff@outlook.com, associated with PayPal account # [REDACTED] 1839;
- Account No. 3: creamgeernblue@outlook.com, associated with PayPal account # [REDACTED] 2700; and
- Account No. 4: thegreatwallcool@outlook.com, associated with PayPal account # [REDACTED] 7714

#### Account No. 1 (-2882)

19. PayPal Account No. 1 was opened on February 9, 2020 by Yan Fei Wang, date of birth [REDACTED]. Two telephone numbers with the country code for China (86) were associated with the account: +86 18559322586 and +86 17100953855. The PayPal account was setup through Internet Protocol (IP) address 101.133.162.46, which resolves to China. Customers who enter into PayPal transactions using their credit card will see the term PayPal on their credit card statement as well as the name of the online merchant. When the online merchant sets up an account with PayPal, the merchant can choose the name he wants to appear on the credit card statement of a customer. This name is referred to by PayPal as the “credit card statement name.” For PayPal Account No. 1, the name listed as part of the Registration Information for the “credit card statement name” was FMONLINESHO. The email associated with the account was makeasnowman@outlook.com. As of about June 4, 2020, Account No. 1 held a balance of \$205,242.23, which was frozen by PayPal. The account appears to have been closed by PayPal on or about April 20, 2020.

20. In reviewing the PayPal transaction records for Account No. 1, approximately 3515 individuals ordered protective face masks and initiated payment transactions to Account No. 1 through PayPal. The total amount of money received by Account No. 1 was \$355,689.37 and the balance in the account as of June 4, 2020, was \$205,242.23.

21. According to information obtained during this investigation, on or about April 23, 2020, an internal review by PayPal identified Account No. 1 as being used to sell personal protective equipment essential to the COVID-19 pandemic response, such as N95 facemasks, at price points nearly 1,500% higher than the manufacturer’s suggested retail price. During the period March 3, 2020 and March 10, 2020, 34% of the sales resulted in buyer claims and disputes that alleged the items they ordered were never received or the items were received were not those that they ordered.

22. The following is a summary of information provided by a victim related to Account No. 1 interviewed during the investigation:

- On or about March 7, 2020, J.P., a resident of Martinsville, VA, in the Western District of Virginia, ordered two packages of N95 face masks containing 10 face masks each. J.P. did not recall the website through which he placed the order but found it by conducting a Google search. JP submitted his payment for the N95 masks through PayPal for \$129.98 which included a \$10.00 shipping charge. This amount represents a per mask price of approximately \$5.99, which is approximately 76% higher than the maximum manufacturer’s suggested retail price.
- J.P. received an email confirming his order from Face Mask Shop, email address antidustmask@outlook.com. J.P. also received an email with details about the shipping status of his order. This email identified the shipper as China Post EMS, the tracking number as LW598890673CN and the seller as makeasnowman@outlook.com. On or about April 16, 2020, J.P. contacted PayPal to dispute the charges.
- On or about April 22, 2020, J.P. received a package with tracking number LW598890673CN from Chen Zhong Fang. The description of

the contents listed by the sender on the outside of the package was “toys” and was valued at \$10.00.<sup>3</sup> Inside the package, J.P. found a gold-colored necklace with a pendant containing a pink gemstone instead of the N95 face masks which he ordered. J.P. also provided law enforcement with a copy of his credit card statement he has through PayPal which indicated a transaction occurred on March 7, 2020 in which his card was charged \$129.98. This transaction description listed on the credit card statement was “PAYPAL PURCH, 8882211161 SAN JOSE CA FMONLINESHO.”

### **Account No. 2 (-1839)**

26. PayPal Account No. 2 was created February 2, 2020 by Fui Chi, date of birth September 29, 1986. Two telephone numbers were associated with the account, +86 16525836224 and +86 17100951703. Account No. 2 was setup through IP address 47.101.135.251 which resolves to China. The “credit card statement name” listed as part of the Registration Information was FMONLINESHO. The email associated with the account was email inevitableoff@outlook.com. As of about June 4, 2020, the account balance was \$128,868.73. The account appears to have been closed by PayPal on or about March 29, 2020.

27. In reviewing the PayPal transaction records for Account No. 2, approximately 1,896 individuals placed orders for protective face masks. The total amount of money received by account was \$204,037.76 and the balance in the account as of June 4, 2020 was \$128,868.73.

28. The following is a summary of information regarding some of the victims related to Account No. 2 obtained during the investigation:

- On or about March 9, 2020, W.H., who resides in Springfield, VA ordered 15 N-95 face masks via PayPal through a merchant, FM Online Shop for a total \$144.97 including shipping. A package was shipped via China Post in March 2020 and was delivered on April 22, 2020. Instead of the N-95 face masks that were ordered, W.H. received a toy necklace. W.H. filed a dispute with PayPal and the FBI’s Internet Crime Complaint Center (IC3). W.H. also attempted emailing the merchant multiple times via the email address provided by Paypal (inevitableoff@outlook.com) but received no response. PayPal has since refunded W.H.’s money.
- On or about March 10, 2020, an employee of city in Florida ordered 50 N-95 face masks from facemaskshop.com using the city’s credit card with SunTrust Bank. The city did not receive the masks they ordered and instead received a rhinestone necklace. The city filed a complaint with PayPal and SunTrust Bank and the charges of \$3,489.88 were reversed.

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<sup>3</sup> China Post requires the sender to declare the item being shipped as well as the value of the item. Source: [http://www.ems.com.cn/serviceguide/e\\_you\\_jian\\_bao\\_guan.html](http://www.ems.com.cn/serviceguide/e_you_jian_bao_guan.html)

- On or about March 12, 2020, an officer with a county sheriff's office in Wisconsin placed an order for 50 N-95 respirators in the amount of \$2,344.92 on the website, safetysmask.com. The sheriff's office did not receive the masks they ordered. The officer reported they received a small trinket.
- On or about March 9, 2020, L.S., a resident of Culpepper, VA, which is in the Western District of Virginia, placed an order for five N-95 respirators for \$89.98. L.S. disputed the charges with PayPal after approximately one month because he had not received his order. On April 24, 2020, he received a package from the seller which contained a black sports bra. The shipping number on the package was LW598389688CN, which matched the tracking number he had received from the seller with details about his shipment. In the email correspondence L.S. received, the merchant name was listed as FM Online Shop, email address inevitableoff@outlook.com. On or about April 25, 2020, L.S. received a refund from PayPal.

**Account No. 3 (-2700)**

29. Account No. 3 was created January 1, 2020 by Meng Xuan Wang, date of birth [REDACTED]. Two telephone numbers were associated with the account, +86 18659488635 and +86 13062290174. The PayPal account was setup through IP address 47.112.200.129 which resolves to China. The "credit card statement name" listed as part of the Registration Information was BESTONLINES. The email associated with the account was creamgeernblue@outlook.com. As of about June 4, 2020, the account balance was \$194,982.40. The account with PayPal appears to have been closed on or about April 22, 2020.

30. In reviewing the PayPal transaction records for Account No. 3, approximately 3,594 individuals placed orders for protective face masks. The total amount of money received by account was \$339,945.90 and the balance in the account as of June 4, 2020 was \$194,982.40.

31. The following is a summary of information provided by several victims related to Account No. 3 who were interviewed during the investigation:

- On or about March 1, 2020, J.S., a resident of Bedford, VA, in the Western District of Virginia, ordered two boxes of N-95 dust masks containing five masks in each box from mygoodmask.com. He paid \$79.98 and the shipping was free. In the email confirmation J.S. received, the email address given for questions about the order was Support@perfectidea.me.
- On or about March 17, 2020, J.S. received an email from PayPal with details of his shipment. J.S. was advised that his package was being shipped by China Post EMS Tracking # LW591903412CN. In this email, J.S. was told to contact email address creamgeernblue@outlook.com with questions about the shipment. J.S. received a package with tracking number LW591903412CN from Chen Zhong

Fang. The description of the contents listed on the outside of the package by the seller was “toys” and was valued at \$10.00 (as required by China Post).

- On or about April 1, 2020, J.S. sent an email to PayPal advising them that he had received 100 “fold up straws” and to refund his account if it had been charged. On April 5, 2020, J.S. received a response from PayPal advising him that Best Online Shop had offered him a partial refund of \$15.00 to resolve the claim. J.S. refused the refund.
- On or about March 1, 2020, A.W., a resident of Stuarts Draft, VA, in the Western District of Virginia, ordered facemasks online for his mother. He paid \$57.99 for 100 FDA 3-Ply Disposable Face Mask. The face masks were never received. A.W. made a complaint to PayPal about not having received the masks, he was told they shipped. Instead of masks, A.W. received a toy called a fidget spinner.
- On or about March 1, 2020, S.H. a resident of Blacksburg, VA, which is located in the Western District of Virginia, ordered face masks online through the website mygoodmask.com. Using her credit card, S.H. paid \$57.99 for 100 FDA 3-Ply Disposable Face Mask. She did not receive any masks but instead received a toy. The tracking number on the package containing the toy was LW581516550CN and was from Chen Zhong Fang.

#### **Account No. 4 (-7714)**

32. Account No. 4 was created February 10, 2020 by Yin Wen Jun, date of birth [REDACTED]. Two telephone numbers were associated with the account, +86 17100950088 and +86 17100956858. The PayPal account was setup through IP address 47.114.73.131 which resolves to China. The “credit card statement name” listed as part of the Registration Information was FMBESTONLIN, email thegreatwallcool@outlook.com. As of about June 4, 2020, the account balance was \$13,923.97. The account with PayPal appears to have been closed on or about April 21, 2020.

33. In reviewing the PayPal transaction records for Account No. 4, approximately 307 individuals placed orders for protective face masks. The total amount of money received by account was \$25,586.23 and the balance in the account as of June 4, 2020 was \$13,923.97.

34. The following is a summary of information provided by a victim related to Account No. 4 who was interviewed during the investigation:

- On or about March 2, 2020, K.M., a resident of Alexandria, VA ordered 10 N-95 respirators on the website mygoodmask.com. She paid \$79.99 for the N-95 respirators. The receipt K.M. received from mygoodmask.com listed its email address as antidustmask@outlook. The N-95 respirators were never received, and she filed a complaint with PayPal. PayPal closed her account refunded her money. K.M. received a toy called a fidget spinner. She did not know who it



was from but recalled the packaging had Chinese characters on it.

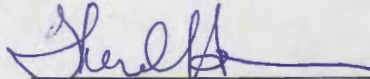
### CONCLUSION

35. Based upon the preceding facts, information, and evidence gathered as a result of the investigation, there is probable cause to believe that the PayPal accounts listed below constitute property involved in violations of 18 U.S.C. § 1956(a)(1)(B)(i), 18 U.S.C. § 1957, and property derived from proceeds obtained as the result of fraud and violations of 18 U.S.C. § 1341, and 18 U.S.C. § 1343 and are therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and 18 U.S.C. § 981(a)(1)(D):

Account No.	Account Name	Associated Email	Amount
██████████ 2882	FMONLINESHO	makeasnowman@outlook.com	\$ 205,242.23
██████████ 1839	FMONLINESHO	inevitableoff@outlook.com	\$ 128,868.73
██████████ 2700	BESTONLINES	creamgeernblue@outlook.com	\$ 194,982.40
██████████ 7714	FMBESTONLIN	theGreatWallcool@outlook.com	\$ 13,923.97

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9th day of June 2020.



Theresa C. Hudson  
Special Agent, Federal Bureau of Investigation

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Krista C. Frith, AUSA, United States Attorney's Office  
310 1st Street, SW, Roanoke, VA 24011  
540-857-2250

**DEFENDANTS**

APPROXIMATELY \$205,242.23 IN PAYPAL, INC. ACCOUNT NO.  
XXXXXXXXXXXXXXXXXXXX2882, et al.

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input checked="" type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
18 U.S.C. §§ 981(a)(1)(A) and/or (D)  
Brief description of cause:  
Civil Forfeiture

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

**JURY DEMAND:** ☐ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE

06/10/2020

SIGNATURE OF ATTORNEY OF RECORD

s/Krista Frith

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE Dillon \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_